

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

ALDO VERA, JR., as Personal Representative
of the Estate of Aldo Vera, Sr.,

Plaintiffs,

-against-

THE REPUBLIC OF CUBA,

Defendant.

12-Civ-1596 (AKH)

Daniel Yorks declares as follows pursuant to 28 U.S.C. § 1746:

1. I am a Director in the Compliance Department of Deutsche Bank Securities Inc. and, more specifically, the Anti-Money Laundering and U.S. Sanctions group. As such, I have responsibility for monitoring compliance by Deutsche Bank Trust Company Americas ("DBTCA") with certain sanctions regulations and knowledge of accounts blocked pursuant to such regulations.

2. I make this declaration, based on my personal knowledge and review of business records in the possession of DBTCA, in order to place certain facts before the Court in support of DBTCA's Opposition to Plaintiff's Motion for Turnover and DBTCA's Cross Motion to Stay.

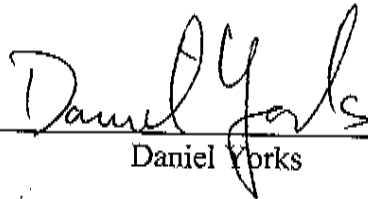
3. I understand that Plaintiff has made certain arguments relating to the account titles used by DBTCA for the 194 accounts at issue in this proceeding. The accounts in question (the "Blocked Wires") were established by DBTCA to hold the proceeds of certain electronic funds transfers ("EFTs" or "wires") that were routed through DBTCA as intermediary bank and blocked by it pursuant to sanctions regulations.

4. When DBTCA blocks a wire pursuant to sanctions regulations, it establishes an interest-bearing account to hold the proceeds of the wire. The accounts are generally given a title that includes the name of the party whose involvement in the wire led the transaction to be blocked.

5. DBTCA follows this naming convention for reasons of administrative convenience only. While an account will sometimes be titled in the name of the beneficiary of a wire as a result of this practice, the account title does not reflect a determination by DBTCA that the beneficiary is the rightful owner of the wire.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on April 15, 2013.



Daniel Yorks